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R E M A R K S

Reconsideration of the present application in view of the amendments and following remarks is respectfully requested. Claims 1-20 were previously canceled. Claims 21, 31, 37, and 45 have been amended. Twenty-seven claims are pending in the application: Claims 21 through 47.

Amendments to the claims

1. Support for the amendments to the claims can be found throughout the originally filed specification, drawings and claims. Specifically, support for the amendments can be found at page 3, lines 25-32, page 20, lines 17-29, and page 35, lines 20-32.

35 U.S.C. § 102

2. Claims 21-23, 26-28, 45, and 46 stand rejected under 35 U.S.C. 102(b) as being anticipated by U.S. Patent No. 5,809,471 (Brodsky).

Brodsky teaches a system in which a user is able to select from a group of words in a stored vocabulary list and then retrieve information from a CD-ROM database relating to the selected word. The group of words is locally generated by an extractor and then is put into a stored vocabulary list. The extractor generates the words from, e.g., the closed caption text of a TV signal. Brodsky describes a system that generates a word list from a received TV signal, and does not receive on a separate channel a keyword associated with the TV signal.

In contrast, amended claims 21 and 45 both recite "receiving content comprising a video image over a first channel;

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and receiving a keyword associated with the video image over a second channel." *Brodsky* does not teach or suggest receiving content comprising a video image over a first channel and receiving a keyword associated with the video image over a second channel. As described above, the keywords of *Brodsky* are generated either from the audio/video signal or from the closed caption text in the vertical blanking interval of the audio/video signal. *Brodsky* is a system for taking a signal that is already available and generating keywords that can be utilized. In contrast, Applicants system utilized keywords that are received over a separate channel from the content, where the keywords have been associated with the content and transmitted over the separate channel (i.e., a first channel and a second channel).

In order for a prior art reference to anticipate a claimed, the reference must teach every element of the claim. M.P.E.P section 2131 states "A claim is anticipated only if each and every element set forth in the claims is found, either expressly or inherently described, in a single prior art reference." Thus, as *Brodsky* does not teach "receiving content comprising a video image over a first channel; and receiving a keyword associated with the video image over a second channel," as claimed by Applicants, the rejection is overcome. Applicants respectfully request the rejection to be withdrawn.

35 U.S.C. §103

3. Claim 25 stands rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 5,809,471 (*Brodsky*) in view of U.S. Patent No. 5,819,284 (*Farber et al.*).

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As described above, *Brodsky* teaches a system for generating a keyword dictionary from an audio/video signal or closed caption text received in the vertical blanking interval.

Farber et al. teaches the use of a profile database that contains information for each user of the system.

However, neither *Brodsky* nor *Farber et al.* teach or suggest "receiving content comprising a video image over a first channel; and receiving a keyword associated with the video image over a second channel," as claimed by Applicants in independent claim 21.

M.P.E.P 2143.03 states that "To establish *prima facie* obviousness of a claimed invention, all the claimed limitations must be taught or suggested by the prior art." As described above with reference to the section 102(b) rejection *Brodsky* does not teach or suggest receiving content and a keyword over a first channel and a second channel, respectively. Nor would it be obvious to modify *Brodsky* because the keywords are generated from the actual content, therefore, there is would be no need or motivation for a keyword to be sent in over a separate channel. Furthermore, Applicants submit that *Farber et al.* do not teach or suggest the above recited claim limitations. Therefore, Applicants submit the combination of *Brodsky* and *Farber et al.* do not make out a *prima facie* case of obviousness as to independent claim 21. Thus, Applicants respectfully submit that claim 25 is in condition for allowance at least because of its dependency upon allowable claim 21 and that the rejection should be withdrawn.

4. Claims 24, 29-35, 37-41, 43 and 44 stand rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No.

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5,809,471 (*Brodsky*) in view of U.S. Patent No. 6,499,057 (*Portuesi*).

As described above, *Brodsky* teaches a system for generating a keyword dictionary from an audio/video signal or closed caption text received in the vertical blanking interval.

Portuesi describes a system for activating a uniform network resource locator displayed in a media broadcast. In one embodiment, a uniform network resource locator can be embedded in a media file. In another embodiment, a video signal or media broadcast can contain information encoded contemporaneously with or prior to broadcast defining an embedded uniform resource locator (See Abstract). *Portuesi* further states that a technical advantage is the ability to encode uniform network resource locators into a video signal such that the video signal can be transmitted across a distribution network or recorded (See Column 3, lines 38-41). Therefore, an advantage of *Portuesi* is having a uniform network resource locator (URL) encoded or embedded in a media file or broadcast. This teaches away from sending the URL over a separate channel from the media which the URL is associated with.

Brodsky and *Portuesi* teach sending a keyword or URL as part of a video file or broadcast. Neither reference by itself or in combination teaches or suggests receiving a keyword associated with content wherein the content and keyword are sent over a first channel and a second channel, respectively, such as stated in Applicants' amended independent claims recited below. Furthermore, *Portuesi* teaches away from such a system as one of the technological advantages of the system is having the URL embedded in a broadcast or part of a movie file.

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Thus, Applicants respectfully submit the combination of *Brodsky* and *Portuesi* do not teach or suggest "receiving content comprising a video image over a first channel; and receiving a keyword associated with the video image over a second channel," such as is claimed by Applicants in amended claims 21 and 45.

Additionally, independent claim 31 recites "displaying a video image that was received over a first channel...and displaying a keyword associated with the portion of the video image in response to the selecting of the portion of the video image, wherein the keyword is received over a second channel." Thus, Applicants respectfully submit the combination of *Brodsky* and *Portuesi* do not teach or suggest independent claim 31.

Furthermore, independent claim 37 recites "displaying a video image that was received over a first channel...and sending over a network a keyword associated with the portion of the video image in response to the selecting of the portion of the video image, wherein the keyword was received over a second channel." Thus, Applicants respectfully submit the combination of *Brodsky* and *Portuesi* do not teach or suggest independent claim 37.

Applicants also respectfully submit that claims 24, 29-30, 32-35, 38-41, 43 and 44 are in condition for allowance at least because of their dependency upon one of independent claims 21, 31, 37, and 45.

5. Claims 36 and 42 stand rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 5,809,471 (*Brodsky*) in view of U.S. Patent No. 6,499,057 (*Portuesi*) further in view of U.S. Patent No. 5,819,284 (*Faber et al.*).

As described above in paragraphs 4 and 5, neither *Brodsky*, *Portuesi*, nor *Faber et al.* teach or suggest Applicants

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amended independent claims. Thus, Applicants submit that claims 36 and 42 are in condition for allowance at least because of their dependency upon allowable independent claims.

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C O N C L U S I O N

In view of the above, Applicants submit that the pending claims are in condition for allowance, and prompt and favorable action is earnestly solicited. Applicants have made a diligent effort to place the claims in condition for allowance. However, should there remain any outstanding issues that require adverse action, it is respectfully requested that the Examiner telephone Thomas F. Lebens at (805) 781-2865 so that such issues may be resolved as expeditiously as possible.

Respectfully submitted,



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